

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

JOSEPH SIMMONS,	:
	:
Plaintiff,	:
	:
v.	:
	:
CITY OF PHILADELPHIA, et al.,	:
Defendants.	:

**JOINT SUBMISSION OF THE PARTIES
PURSUANT TO THE COURT'S November 15th ORDER**

- 1. Status of Discovery** - the parties met and conferred on November 18, 2024 regarding discovery and ESI search terms. This was the first meet and confer to negotiate ESI search terms. Following the conference, the majority of outstanding discovery is related to the ESI terms and Defendants have made an initial request based on the terms to determine the quantity of data that will be returned for each request. Once preliminary results are received, the parties will confer again to determine if additional negotiation is necessary before production can begin. Since that meeting, Defendants have produced approximately 2,200 additional documents pursuant to a confidentiality agreement by and between counsel.
- 2. Depositions:** Plaintiff's deposition is scheduled for January 8, 2025. Plaintiff intends to schedule additional deposition in January 2025.
- 3. Outstanding discovery:** Defendants anticipate additional productions by the end of December 2024, which the parties anticipate will satisfy the outstanding discovery requests. ESI will be completed by the end of February 2025 and will be provided on a rolling basis.

Date: December 2, 2024

Respectfully submitted,

/s/ Nia Holston
Nia Holston, Esquire
Attorney for Plaintiffs

/s/ Kathryn Faris
KATHRYN FARIS
Senior Attorney
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